

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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LOUIS GACHELIN and DEBORAH ABRAHAMS,

Case No.: 1:25-cv-03127- PKC-LKE

Plaintiffs,

-against-

KAVULICH AND ASSOCIATES P.C.,
GARY KAVULICH,
RENAISSANCE EQUITY HOLDINGS LLC
D, HASHEM HUSSEIN and
A & F PROCESS SERVICE, INC. d/b/a
ALLIED PROCESS SERVICE,

Defendants.

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DECLARATION IN SUPPORT OF REQUEST FOR CERTIFICATE OF DEFAULT OF
A & F PROCESS SERVICE, INC.

STATE OF NEW YORK)
) ss.:
COUNTY OF KINGS)

I, Ahmad Keshavarz, hereby declares as follows:

1. I am a member of the Bar of this Court and am a partner at the Law Office of Ahmad Keshavarz, which serves as attorney for plaintiff in the above-entitled action, and I am familiar with all the facts and circumstances in this action.
2. Jurisdiction of the subject matter of this action is based on federal question jurisdiction pursuant to the FDCPA, 15 USC 1692 *et al*, over Defendants Kavulich and Associates, P.C., Gary Kavulich, Hashem Hussein, and A & F Process Service Inc. d/b/a Allied Process Service.
3. The court has supplemental jurisdiction over Defendant Renaissance Equity Holdings LLC D pursuant to 28 U.S.C. § 1367 as the state law claims against said defendant share a common nucleus of operative facts with the federal claim against Defendants Kavulich and Associates, P.C., Gary Kavulich, Hashem Hussein, and A & F Process Service Inc., and are so related as to form part of the case or controversy under Article III of the United States constitution.
4. Defendant A & F Process Service, Inc. is indebted to plaintiff for violations of N.Y. General Business Law § 349, New York City Administrative Code § 20-409.2, negligence, and gross negligence, as delineated in the Original Complaint [DE 1].
5. This action was commenced on June 4, 2025 by the filing of the summons and complaint. [DE 1]. A copy of the summons and complaint was served on the defendant A & F Process

Service, Inc. on June 20, 2025 by personal service on Bryan Millner, who is of suitable age and discretion and authorized agent at the New York Office of the Secretary of State [DE 8]. Proof of service by the Process Server was filed on July 7, 2025. [DE 8]. Defendant A & F Process Service, Inc. has not answered the complaint or moved to dismiss and the time for the Defendant to do so has expired.

WHEREFORE, plaintiffs Louis Gachelin and Deborah Abrahams request that the default of Defendant A & F Process Service, Inc. be noted and a certificate of default issued.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the amount claimed is justly due to plaintiff, and that no part thereof has been paid.

Dated: Brooklyn, New York
July 14, 2025

/s/ Ahmad Keshavarz

Ahmad Keshavarz
Affiant
Law Office of Ahmad Keshavarz
16 Court St., 26th Floor
Brooklyn, NY 11241-1026